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Amendment/Response

Reply to Office Action of February 17, 2006

### REMARKS/DISCUSSION OF ISSUES

Claims 1-24 are pending in this application. No claims are amended. The Examiner is thanked for clarifying the rejections so Applicants can better particularize their arguments. The arguments previously advanced in the last response are considered to be re-presented herein, but are omitted to address the Examiner's latest reasoning.

# Rejections under 35 U.S.C. § 103(a)

Claims 1-24 are rejected under U.S.C. § 103(a) as being unpatentable over Morimoto et al. in view of Smith III. The rejection of the claims is respectfully traversed.

Even if the elements of Morimoto et al. and Smith III are combined, the elements of the present claimed invention are not found.

The Examiner mistakenly characterizes Morimoto et al.'s searching of other dictionaries via the Internet as being the same as the Applicants' using a predetermined Internet search engine. The two are not the same. In the ease of Morimoto et al., the Internet is the communications link which connects Morimoto et al.'s apparatus with dictionaries (content storers) which are located elsewhere. In the case of the Applicants' device, the Internet is not only the communications link, but also the content storer; i.e., the Internet search engine searches the Internet to attempt to find the translation. In other words, there is a big difference between simply using the Internet to access other dictionary sites and using an Internet search engine to search the Internet itself. Col. 14, lines 53-60 and Fig. 18 does not mention using an Internet search engine, but merely shows how a request to a dictionary located elsewhere is handled.

When Morimoto et al. can't find a word in its own dictionary, it looks to other dictionaries on the Internet (col. 12, lines 1-6). Morimoto et al. recognizes that this can lead to problems, so an elaborate prioritization scheme is developed (remainder of col. 12). That is, Morimoto et al. recognizes problems with its own methods and devises solutions to them. There is no discussion in Morimoto et al. about looking to a general Internet search rather than looking to a dictionary search, which would further exacerbate the problems that Morimoto et al. is trying to solve. Morimoto et al. therefore actually teaches away from using an Internet search engine.

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The Smith III reference isn't about translations or machine translations, but rather is about a method for facilitating linking on the web. There is no "first language" and "second language" in Smith III. While it is acknowledged that Smith III teaches a predetermined Internet search engine (although not based on the "first language" because Smith III doesn't teach first and second languages), Smith III does not teach a link setter for the unknown word, because Smith III doesn't have any unknown words. This is because Smith III is directed to establishing hyperlinks for certain words or phrases and is not directed to machine translations, so the concept of unknown word as defined in the specification (page 2, lines 6-9) does not exist in Smith III. Smith III uses the concept of "word being looked up" (col. 6, lines 27-29), but the "word being looked up" is not an unknown word as that term is used in the instant patent application.

In the instant patent application, lines 6-9 on page 2 of the specification states, "In the conventional machine translation systems, any word not registered in the dictionaries (hereinafter sometimes referred to as "unknown word") cannot be translated. Therefore, a user must consult, for example, a paper dictionary for an appropriate translation word or equivalent for the unknown word, which would result in inefficient and inconvenient translation word searching."

Smith III does not actually look up a "definition" but rather provides a link installation service which automatically installs hyperlinks within information submitted to the service by hypertext authors (col. 3, lines 49-52). Smith III thus provides the equivalent of footnotes to words and phrases based on the hypertext authors' desires. The claimed invention, on the other hand, automatically installs a hyperlink for an untranslatable word not found in any of the dictionaries the machine translation system or program has access to.

Therefore, even combining Smith III with Morimoto et al. does not yield the claimed invention because of the missing features, "a link setter for setting a link for said unknown word in said first language in said translated text displayed by said display for which an instruction is provided, such that a search for said unknown word in said first language is conducted using said unknown word as a search word in a predetermined Internet search engine based on said first language."

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Because the combination of references does not produce the claimed invention,

Applicants respectfully suggest that the rejection is overcome. Reconsideration of the rejection
of claims 1-24 under U.S.C. § 103(a) is respectfully requested.

In view of the foregoing, Applicants respectfully request that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated or by e-mail directed to Chris@PatentingServiees.com.

Respectfully submitted,

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